

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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STEVEN BUTZLAFF,

Plaintiff,

Case No.: 16-cv-747

v.

STATE OF WISCONSIN  
DEPARTMENT OF CORRECTIONS,

Defendant.

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**DEFENDANT'S RULE 26(A)(3)(A) AND (B) DISCLOSURES**

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Defendant State of Wisconsin Department of Corrections, by and through its undersigned counsel, submits its Rule 26(a)(3)(A) and (B) Disclosures.

**Names of Witnesses Defendant Will Call:**

1. Mark Nelson
2. Bryan Brennan
3. Tim Clemons
4. Tonja Hesselberg
5. Richard Bailey
6. Robert Bostedt
7. Steven Butzlaff
8. Tracy Dunwald – HR Director, records custodian, Oakhill Correctional Institution

**Names of Witnesses Defendant May Call:**

1. Michael Dittman
2. James Logan
3. John Paquin
4. Peter Wigglesworth
5. Marty Winchell
6. Robert Humphreys
7. Donald Strampe
8. Any witness identified on Plaintiff's witness list, regardless of whether Plaintiff actually calls that witness at trial.

The above-listed witnesses may be contacted through defense counsel.

Based upon the presentation of plaintiff's case, defendant reserves the right to call rebuttal witnesses.

**EXHIBITS**

The Defendant's exhibit list will be filed as a separate document on today's date.

Dated this 2<sup>nd</sup> day of February, 2018.

Respectfully submitted,

BRAD D. SCHIMEL  
Wisconsin Attorney General

s/ Rachel L. Bachhuber  
RACHEL L. BACHHUBER  
Assistant Attorney General  
State Bar #1052533  
ANNE M. BENSKY  
Assistant Attorney General  
State Bar #1069210

Attorneys for Defendant

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-0188 (Bachhuber)  
(608) 264-9451 (Bensky)  
(608) 267-8906 (Fax)  
bachhuberrl@doj.state.wi.us  
benskyam@doj.state.wi.us